

## World of Travel – privacy policy – May 21<sup>st</sup> 2018

This policy contains, on one hand, the guidelines that World of Travel uses when processing personal data, in accordance with the objectives and obligations arising from the General Data Protection Regulation, namely Regulation (EU) 2016/679 of April 27<sup>th</sup> 2016 of the European Parliament and the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (in short "GDPR").

"World of Travel bvba", having its registered office in Kortrijk 8500, Rijselsestraat 40/15, registered with company number BE 464.587.834, acts as the person responsible for processing personal data.

World of Travel bvba wishes you to read this privacy policy carefully, as this document contains essential information about the way in which your personal data is processed.

### I. General

World of Travel bvba confirms the legislation in force, being the Law of December 8<sup>th</sup> 1992 on the protection of privacy and its implementing decisions, and the European General Data Protection Regulation of April 27<sup>th</sup> 2016.

### II. Definitions

- (a) *"Personal Data"*: all information about an identified or identifiable natural person ("the data subject"). Identifiable is a natural person who can be identified directly or indirectly, in particular by means of an identifier such as a name, an identification number, location data, an online identifier or one or more elements characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person. Appendix 1 specifies which Personal Data the Processor will process in accordance with this agreement and for which processing purposes.
- (b) *"Processing"*: an operation or a set of operations relating to personal data or a set of personal data, whether or not carried out via automated processes, such as collection, recording, organizing, structuring, storing, updating or changing, retrieving, consult, use, provide by forwarding, distributing or otherwise making available, aligning or combining, shielding, deleting or destroying data.
- (c) *"Controller"*: a natural or legal person who, alone or together with others, determines the purpose of and means for processing personal data.
- (d) *"Processor"*: a natural or legal person who processes personal data on behalf of the Data Controller.
- (e) *"Sub-processor"*: the subcontractor who is appointed by the Processor to take over part of the processing process for the Controller.

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- (f) *"Personal Data Violation"* : a security breach that accidentally or unlawfully leads to destruction, loss, alteration, or unauthorized disclosure of or unauthorized access to transmitted, stored or otherwise processed personal data; also called "Data breach";
- (g) *"GDPR"*: General Data Protection Regulation, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27<sup>th</sup> 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of those data and repealing Directive 95/46 / EC.

### III. Processing of personal data

Below is summarized which personal data and for which purposes World of Travel bvba processes your personal data on and on which basis the processing supports.

The following personal data can be processed in the context of **the service to** customers, prospects and suppliers of World of Travel bvba:

#### Identification data:

- Name and first name (s)
- Family composition
- Address (registered office if company)
- VAT and / or enterprise number (if company)
- Telephone / mobile number
- Personal e-mail address
- Vehicle data
- Driving license information
- International passport data
- Identity card details
- Content of messages (sms, e-mail ...)

#### Financial details:

- Bank account number
- Payment card details
- Invoices
- Credit card number

#### Personal characteristics:

- Birthdate and -place
- Sex
- Age
- Nationality
- Language

#### Consumption habits:

- Data about customer cards and loyalty cards
- Travel history in the context of visa application

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### Leisure activities and interests:

- Interests

The above information is processed in the face of the implementation of the agreement that you have made with World of Travel bvba. The processing of your personal data is more concrete in the context of the delivery at the agreed place, as well as in the context of invoicing and the follow-up of payment of the invoice.

"World of Travel bvba" supports the processing of personal data in this case on the legitimate interest that World of Travel bvba has in the proper and effective execution of the agreement.

In the context of the access you grant yourself to and the use you make of our website, the following personal data is processed:

- Cookies (your surfing behavior)
- Your IP address
- First Name
- Name
- E-mail address
- Telephone number
- Family composition

World of Travel bvba processes the above data in the face of optimizing the content and functioning of the website, in accordance with the visitor's needs.

For this processing, World of Travel bvba invokes the legitimate interest that World of Travel bvba has in offering an easily accessible, comprehensible, adequate, complete and relevant website.

For more information regarding the use of the World of Travel bvba website, reference is made to the website disclaimer and the cookie policy.

In the context of the electronic and / or postal delivery of newsletters and advertising brochures, the following personal data are processed:

- Email address (registration via double opt-in)
- Name and first name
- Address

The above data is processed in the face of personalizing our newsletter and our advertising brochures, as well as to inform you of current promotions or relevant travel information.

World of Travel bvba relies on your explicit and prior consent to the processing of the personal data.

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For the compilation and analysis of **non-anonymised statistics (only at the request of companies)**, the following personal data are processed:

- Name, first name of travelers
- Any company data
- Travel history, travel budget

The legal basis on which World of Travel bvba relies is the legitimate interest of the company to continually evaluate and improve its services.

For the compilation and analysis of anonymized statistics, the following personal data are processed:

- Visiting and surfing habits website

The processing for statistical purposes takes place on the basis of coded data, from which the identity of the data subject cannot be retrieved.

The legal basis on which World of Travel bvba relies is the legitimate interest of the company to continually evaluate and improve its services.

World of Travel bvba undertakes not to process your personal data for any purpose other than the purposes stated above, unless you give World of Travel bvba prior explicit permission to do so. World of Travel bvba assures you that your personal data will not be stored if World of Travel bvba no longer needs your data for the provision of services, or if World of Travel bvba is no longer bound by a legal obligation to retain.

You are not required to transfer your personal data to World of Travel bvba. However, you are aware that the refusal to provide some of the basic information to World of Travel bvba may result in World of Travel bvba being unable to provide you with specific services.

### **IV. Retention period**

Your personal data processed by World of Travel bvba is stored for a period of 10 years.

### **V. Rights**

As a data subject whose personal data are being processed, you have a number of rights with regard to the processing carried out by World of Travel bvba.

To exercise these rights, you should contact the GDPR representative of World of Travel via [info@worldoftravel.be](mailto:info@worldoftravel.be). For the procedure to be followed, World of Travel bvba refers you to the separate document "Procedure for exercising rights (GDPR)".

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World of Travel bvba is obliged to respond to this request within a period of one month. Only when you submit your request to exercise your rights through the aforementioned procedure, will an appropriate response follow within the stipulated period.

You have the following rights:

- Right to view and access

You have the right to access your personal data, as well as the right to consult its use via e-mail to the aforementioned service. You can obtain a free copy of your available personal data at any time upon simple request.

- Right to improvement, erasure and restriction

Except for those personal data that must necessarily be processed in the context of an agreement or in the context of storage under a legal obligation, you can indicate which personal data may not be processed at all or only for a limited number of processing operations. In addition, you can ask to delete those personal data that may not be processed in whole or in part. You can also request that your personal data be verified and, if necessary, corrected.

- Right of objection, automated decisions and profiling

You can object to the processing of your personal data at any time if this objection is based on serious and legitimate reasons. If you wish to object to the use of your personal data for direct marketing purposes, you do not have to state any reasons for this. The processing of personal data by World of Travel bvba does not happen on the basis of automated decisions, in other words not without any human intervention. World of Travel bvba does not profile on the basis of the available personal data.

- Right to withdraw permission

If a processing of your personal data is based on the permission you have given, you can withdraw this permission at any time.

- Right to transferability

Under the conditions stipulated in the GDPR you have the right to obtain your personal data in a structured, common and machine-readable form. You can ask World of Travel bvba to transfer your data in this way to another Processing Controller.

- Complaints

If you believe that your rights as a data subject are being damaged by or during the processing of your personal data, you have the right to file a complaint with the Supervisor (the Commission for the Protection of Privacy, Drukpersstraat 35, 1000 Brussels, e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be), tel. +32 (0) 2 274 48 00, fax +32 (0) 2 274 48 35), without prejudice to any other possibility to file an administrative appeal or to make a provision in court.

## **VI. Transfer to third parties**

World of Travel bvba undertakes not to sell, rent, distribute or make your personal data available to third parties in any other way, unless the communication to the third party is made within the framework of a legal obligation. In exceptional cases, mandatory legislation obliges World of Travel bvba to transfer your personal data to the competent government authorities. The same applies if a court order imposes on World of Travel bvba the obligation to communicate personal data to a number of persons who are authorized by the court order to become acquainted with the relevant personal data.

World of Travel bvba, however, makes a reservation for the partial or complete reorganization or a transfer of the activities of the company. In this case, the business activities also transfer your personal data to those third parties involved in the transfer and the confidential negotiations prior to the transfer.

To the extent possible World of Travel bvba will inform you of the transfer to the aforementioned third parties.

## **VII. Security and confidentiality**

World of Travel bvba guarantees that the processing of your personal data is done in an adequate, correct and safe manner. If you wish, you will be informed in a transparent manner about the processing procedures and the appropriate technical and organizational measures taken to prevent any loss, falsification or unlawful modification of, as well as unlawful access to, the personal data.

## **VIII. Amendments**

World of Travel bvba reserves the right to change this policy. If substantial changes are made, World of Travel bvba takes all reasonable measures to inform you before the changes take effect.